

PRA RECEIVABLES MANAGEMENT, LLC

www.portfoliorecovery.com

August 21, 2017

BY FIRST CLASS MAIL

Georgette Miller, Esq.
Law Office of Georgette Miller
Evesham Avenue
Lawnside, NJ 08045

Re: Nicole Cruz; Case Number 14-18833
Assignment of Account
Account Number: 902021444
Original Account Number: 00000000920505342000
Collateral: 2013 Nissan Rogue VIN # JN8AS5MT7DW020544

Dear Attorney Miller:

On March 31, 2017, Portfolio Recovery Associates, LLC became the successor in interest to Ally Bank with regard to the above-referenced account, and is now the creditor to whom your client's balance is owed. On March 31, 2017, servicing of your client's account was transferred to PRA Receivables Management, LLC ("PRA RM").

Your client's unpaid principal balance is \$15,919.79 and interest is accruing at an annual percentage rate of 9.2900% on the unpaid principal balance. The monthly installment is \$473.24 and the next payment due date is April 16, 2017. Our records reflect the plan provides for the payment of this account outside the Chapter 13 plan.

Please direct payments to:

PRA Receivables Management, LLC.
PO Box 12914
Norfolk, VA 23541

Please direct correspondence to our office located at:

PRA Receivables Management, LLC
10 Orchard, Suite 100
Lake Forest, CA 92630
Telephone: 800-642-6233
Facsimile: 949-858-3821

Please take this opportunity to update your records. Should you have any questions, please contact us.

Sincerely,



Stephanie Sabin
Manager

This is not an attempt to collect a debt. In light of the bankruptcy pursuant to case number 14-18833, PRA RM does not seek to satisfy or collect any monetary claim against the obligors. PRA RM intends to exercise its in rem rights and claims in any collateral, only.

NOTICE: SEE NEXT PAGE FOR IMPORTANT INFORMATION Page 1 of 2

10 Orchard, Suite 100, Lake Forest, CA 92630 • Telephone: 1-800-642-6233 • Facsimile: 949-858-3821

PRA RECEIVABLES MANAGEMENT, LLC

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PRIVACY NOTICE

We are required under federal law to provide this notice to our customers

PRIVACY NOTICE: We collect certain personal information about you from the following sources: (a) information we received from you; (b) information about your transactions with our affiliates, others, or us; (c) information we receive from consumer reporting agencies. We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. We restrict access to nonpublic information about you to those employees and entities that need to know that information in order to collect your account. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

PRA RECEIVABLES MANAGEMENT, LLC

BY FIRST CLASS MAIL

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Monday August 21, 2017

Georgette Miller, Esq.
Law Office of Georgette Miller
Evesham Avenue
Lawnside, NJ 08045

Re: **Direct-to-Creditor Payment Default**
In re: Nicole Cruz
Chapter 13, Case No. 14-18833
Collateral: 2013 Nissan Rogue VIN# JN8AS5MT7DW020544
Post-petition Delinquency: \$2,366.20
Account number: 902021444

Dear Attorney Miller,

I hope this letter finds you well. I write regarding your Chapter 13 client, Nicole Cruz, as it relates to your client's 2013 Nissan Rogue. Please know that Ally Bank assigned your client's promissory obligation and its corresponding security interest in the 2013 Nissan Rogue to Portfolio Recovery Associates, LLC ("PRA") by filing a Notice of Transfer with the bankruptcy court pursuant to Fed. R. Bankr. P. 3001 (c)(2).

On March 31, 2017, Portfolio Recovery Associates, LLC became the successor in interest to Ally Bank with regard to the above-referenced account, and is now the creditor to whom your client's balance is owed. On March 31, 2017, servicing of your client's account was transferred to PRA Receivables Management, LLC ("PRA RM").

Your client's confirmed Chapter 13 repayment plan requires them to make timely, post-petition monthly direct-to-creditor payments relative to the 2013 Nissan Rogue loan in the amount of \$473.24 per month. However, PRA RM's records reflect that they have failed to make these payments.

While PRA RM stands ready to retain local counsel to file papers requesting that the automatic stay be lifted in PRA RM's favor so that it may exercise its security interest, I thought it might be more efficient to first contact your office in order to give your client an opportunity to make an arrangement so that filing such documents would not be necessary. **Your client should remit payment or contact my office before September 5, 2017.**

Should you have any questions regarding this request, you may contact our office by telephone at (800) 642-6233 ext 33504, or by facsimile at (949) 858-3821.

Sincerely,


Stephanie Sabin

PRA Receivables Management, LLC

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BY FIRST CLASS MAIL

August 21, 2017

Georgette Miller, Esq.
Law Office of Georgette Miller
Evesham Avenue
Lawnside, NJ 08045

Re: **§1326(a)(4) Proof of Required Insurance Coverage**
In re: Nicole Cruz
Chapter: 13, Case Number 14-18833
Collateral: 2013 Nissan Rogue VIN # JN8AS5MT7DW020544
PRA RM File No.: 783684

Dear Attorney Miller:

Please be advised, On March 31, 2017, Portfolio Recovery Associates, LLC became the successor in interest to Ally Bank with regard to the above-referenced account, and is now the creditor to whom your client's balance is owed. On March 31, 2017, servicing of your client's account was transferred to PRA Receivables Management, LLC ("PRA RM").

Our records reflect that your client is retaining possession of the collateral securing Portfolio Recovery Associates, LLC's ("PRA") interest to Ally Bank claim and pursuant to §1326(a)(4), we are respectfully reminding you that your client needs to provide proof that the automobile identified in the caption of this letter is insured against risk of fire, theft and collision.

Please send a copy of the policy's declaration page to our Lake Forest, CA office within 10 days from the date of this letter. Please change the loss payee to:

PRA Receivables Management, LLC
10 Orchard, Suite 100
Lake Forest, CA 92630
Telephone: 1-800-642-6233
Fax: 949-858-3821

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : BANKRUPTCY NO. 14-18833(SR)
NICOLE C. CRUZ :
Debtor : CHAPTER 13

**STIPULATION RESOLVING ALLY FINANCIAL
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

THIS MATTER having been brought before the Court on a Motion for Relief from the Automatic Stay by Lavin, O'Neil, Cedrone & DiSipio, attorneys for Ally Financial and Georgette Miller, Esquire attorney for Debtor, Nicole C. Cruz (the "Debtor"), having consented to the entry of the within Order, and for good cause shown;

AND NOW COMES Ally Financial, by and through their counsel, and state as follows:

(a) The Debtor financed the purchase of a 2013 Nissan Rogue, VIN: JN8AS5MT7DW020544 (the "Vehicle") pursuant to the terms of a Retail Installment Sale Contract dated May 17, 2013 (the "Contract") which has been assigned to Ally Financial.

(b) Pursuant to the Contract, Ally Financial maintains a perfected security interest in and to: (a) the Vehicle; (b) accessories, equipment and replacement parts installed in the Vehicle; and (c) service contracts on the Vehicle.

(c) The Debtor desires to retain possession of the Vehicle and provide adequate protection for Ally Financial's interest in the Vehicle.

NOW THEREFORE, in consideration of the above, Ally Financial and the Debtor STIPULATE AND AGREE as follows:

1. Since the filing of said motion, the Debtor has brought the post-petition arrear current through and including the January 16, 2015 due contract payment.

2. The Debtor shall resume making regular monthly contractual payments in the amount of \$473.24 each, commencing with the payment due on or before February 16, 2015. Pursuant to the Contract, a late charge may be assessed for any payment not received in full within ten (10) days after it is due.

3. The Debtor shall make the regular contract payment in the amount of \$473.24 on or before February 16, 2015 and all future payments on time. Said payment shall be forwarded to: Ally Financial, Payment Processing Center, P.O. Box 78234, Phoenix, AZ 85062.

4. All payments shall be made payable to Ally Financial, Payment Processing Center, P.O. Box 78234, Phoenix, AZ 85062.

5. The Debtor's account is in pre-petition arrears in the amount of \$1,045.79. The Debtor acknowledges her account is in pre-petition arrears in the amount of \$1,045.79.

6. Ally Financial is awarded counsel fees in the amount of \$500.00 to cover the costs of filing the motion. Counsel fees shall be paid through the Chapter 13 Plan.

7. The Debtor will pay the pre-petition arrears in the amount of \$1,045.79 through the Chapter 13 Plan plus counsel fees in the amount of \$500.00 to cover the costs of filing the motion for a total of \$1,545.79. The Trustee may send payment to Ally Financial, Payment Processing Center, P.O. Box 78234, Phoenix, AZ 85062.

8. All Financial shall file an amended Proof of Claim including the pre-petition arrears and attorney's fees as stated above. Debtor shall amend her plan to include this amount.

9. The Debtor hereby agrees to maintain insurance coverage in such types and amounts as are required by the Contract until such time as all amounts due Ally Financial under the Contract are paid in full.

10. If Debtor fails to comply with any of the stipulated terms herein, or if Debtor fails to make the stipulation payments or regular payments due and owing within ten (10) days of due date, Ally Financial will give Debtor and Debtor's counsel notice by facsimile, first class mail or e-mail. Debtor will have fifteen (15) days to bring the account current. If the account is not brought current within the fifteen (15) day period, Ally Financial may be granted relief from the automatic stay with respect to the Vehicle upon filing a Certification of Counsel that Debtor is in default, together with a proposed Order to the Bankruptcy Court, and serving copies of the same upon the Trustee, Debtor and Debtor's counsel.

11. If for any reason Debtor(s)' case is closed, terminated, dismissed or converted, the parties hereto agree and acknowledge that the terms of this agreed/stipulated order will be null and void and the parties are returned to the status quo with their respective rights under state law and the Contract.

12. This Stipulation may be executed by facsimile and such facsimile signatures shall be deemed as originals.

13. The signature pages of this Stipulation may be executed in counterpart and all such signature pages, when attached, shall become part of the original Stipulation.

CONSENTED TO BY:

DATED: 2/18/15


GEORGE B. MILLER, ESQUIRE
Attorney for the Debtor

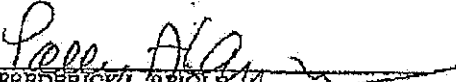
CONSENTED TO BY:

DATED: 2/23/15


REGINA COHEN, ESQUIRE
Attorney for Ally Financial

CONSENTED TO BY:

DATED: 2/26/15


FREDERICK L. REAGLE
Chapter 13 Trustee

SO ORDERED:

ENTERED ON: 3/3/15


STEPHEN RASLAVICH
United States Bankruptcy Judge

1763309v1

PRA RECEIVABLES MANAGEMENT, LLC

www.portfoliorecovery.com

August 21, 2017

BY FIRST CLASS MAIL

Nicole Cruz
4311 North Fairhill St.
Philadelphia, PA 19140

Re: Nicole Cruz; Case Number 14-18833
Assignment of Account
Account Number: 902021444
Original Account Number: 0000000920505342000
Collateral: 2013 Nissan Rogue VIN # JN8AS5MT7DW020544

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10 Orchard, Suite 100
Lake Forest, CA 92630
Telephone: 800-642-6233
Facsimile: 949-858-3821

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Sincerely,



Stephanie Sabin
Manager

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Monday August 21, 2017

Nicole Cruz
4311 North Fairhill St.
Philadelphia, PA 19140

Re: **Direct-to-Creditor Payment Default**
In re: Nicole Cruz
Chapter 13, Case No. 14-18833
Collateral: 2013 Nissan Rogue VIN# JN8AS5MT7DW020544
Post-petition Delinquency: \$2,366.20
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August 21, 2017

Nicole Cruz
4311 North Fairhill St.
Philadelphia, PA 19140

Re: **§1326(a)(4) Proof of Required Insurance Coverage**
In re: Nicole Cruz
Chapter: 13, Case Number 14-18833
Collateral: 2013 Nissan Rogue VIN # JN8AS5MT7DW020544
PRA RM File No.: 783684

Dear Attorney Miller:

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Please send a copy of the policy's declaration page to our Lake Forest, CA office within 10 days from the date of this letter. Please change the loss payee to:

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Second Request

BY FIRST CLASS MAIL

Tuesday, September 19, 2017

Georgette Miller, Esq.
Law Office of Georgette Miller
Evesham Avenue
Lawnside, NJ 08045

Re: **Direct-to-Creditor Payment Default**

In re: Nicole Cruz

Chapter 13, Case No. 14-18833

Collateral: 2013 Nissan Rogue VIN# JN8AS5MT7DW020544

Post-petition Delinquency: \$2,839.44

Account number: 902021444

Dear Attorney Miller,

I hope this finds you well. In my letter to you dated August 21, 2017, I made you aware that Ally Bank assigned to Portfolio Recovery Associates, LLC ("PRA") your client's 2013 Nissan Rogue loan. As previously advised, servicing of your client's loan was transferred to PRA Receivables Management, LLC ("PRA RM").

Your client's confirmed Chapter 13 repayment plan requires them to make timely, post-petition monthly direct-to-creditor payments relative to the promissory obligation now held by PRA RM of \$473.24 per month. However, PRA RM's records reflect that they have still not made these payments.

Failing to make the required, direct payments to PRA RM constitutes a material default with respect to the terms of the confirmed Plan, and as such, PRA RM stands ready to retain local counsel to file papers. Out of courtesy to you and your client, I thought it might be more efficient, for the second time, to contact your office in order to give your client another opportunity to make an arrangement so that filing such documents would not be necessary. Your client should remit payment or contact my office before October 04, 2017.

Should you have any questions regarding this request, you may contact our office by telephone at (800) 642-6233 ext 33522, or by facsimile at (949) 858-3821.

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We hope this letter finds you well. In our letter to you of August 21, 2017 we requested that your client provide proof that the automobile identified in the caption of this letter is insured against risk of fire, theft and collision as your client is retaining possession of the collateral securing Portfolio Recovery Associates, LLC's ("PRA") claim. As of the date of this letter, we have received no insurance information whatsoever.

Failure to provide PRA RM with reasonable evidence of the required insurance coverage with respect to the use or ownership of PRA's collateral is a violation of §1326(a)(4) and, as such, PRA RM stands ready to retain local counsel to file papers. Out of courtesy to you and your client, I thought it might be more efficient, for a second time, to contact your office in order to give your client yet another opportunity to provide me with proof of the required insurance coverage so that filing such documents would not be necessary.

Please send a copy of the policy's declaration page to our Lake Forest, CA office **within 10 days from the date of this letter. Please change the loss payee to:**

**PRA Receivables Management, LLC
10 Orchard, Suite 100
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Manager

GS/ 783684/ 2016

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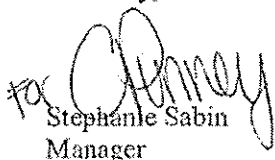
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Manager

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL®

7017 1450 0000 8177 8277
7017 1450 0000 8177 8277U.S. Postal Service
CERTIFIED MAIL® RECEIPT
Domestic Mail OnlyFor delivery information, visit our website at www.usps.com**OFFICIAL USE**

Certified Mail Fee \$

Mailed From 92630

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$☐ Return Receipt (electronic) \$☐ Certified Mail Restricted Delivery \$☐ Adult Signature Required \$☐ Adult Signature Restricted Delivery \$

Postage \$

Total Postage and Fees \$

Postmark Here

Sent To

Nicole Cruz

Street and Apt. No., or PO Box No.

4311 North Fairhill St.

City, State, ZIP+4®

Philadelphia, PA 19140

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Nicole Cruz

4311 North Fairhill St

Philadelphia, PA 19140



9590 9402 3934 8060 3734 37

2. Article Number (Transfer from service label)

7017 1450 0000 8177 8277

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ Agent☒ Address

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery (over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

PRA RECEIVABLES MANAGEMENT, LLC

www.portfoliorecovery.com

August 29, 2018

BY CERTIFIED MAIL R.R.R.
7017 1450 0000 8177 8277

Nicole Cruz
4311 North Fairhill St.
Philadelphia, PA 19140

Re: Nicole Cruz; Case Number 14-18833
Assignment of Account
Account Number: 902021444
Original Account Number: 00000000920505342000
Collateral: 2013 Nissan Rogue VIN # JN8AS5MT7DW020544

Dear Attorney Miller:

On March 31, 2017, Portfolio Recovery Associates, LLC became the successor in interest to Ally Bank with regard to the above-referenced account, and is now the creditor to whom your client's balance is owed. On March 31, 2017, servicing of your client's account was transferred to PRA Receivables Management, LLC ("PRA RM").

Your client's unpaid principal balance is \$15,919.79 and interest is accruing at an annual percentage rate of 9.2900% on the unpaid principal balance. The monthly installment is \$473.24 and the next payment due date is April 16, 2017. Our records reflect the plan provides for the payment of this account outside the Chapter 13 plan.

Please direct payments to:

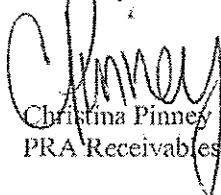
PRA Receivables Management, LLC.
PO Box 12914
Norfolk, VA 23541

Please direct correspondence to our office located at:

PRA Receivables Management, LLC
10 Orchard, Suite 100
Lake Forest, CA 92630
Telephone: 800-642-6233
Facsimile: 949-858-3821

Please take this opportunity to update your records. Should you have any questions, please contact us.

Sincerely,



Christina Pinney
PRA Receivables Management, LLC

This is not an attempt to collect a debt. In light of the bankruptcy pursuant to case number 14-18833, PRA RM does not seek to satisfy or collect any monetary claim against the obligors. PRA RM intends to exercise its in rem rights and claims in any collateral, only.

NOTICE: SEE NEXT PAGE FOR IMPORTANT INFORMATION Page 1 of 2

10 Orchard, Suite 100, Lake Forest, CA 92630 • Telephone: 1-800-642-6233 • Facsimile: 949-858-3821

PRA RECEIVABLES MANAGEMENT, LLC
www.portfoliorecovery.com

PRIVACY NOTICE

We are required under federal law to provide this notice to our customers

PRIVACY NOTICE: We collect certain personal information about you from the following sources: (a) information we received from you; (b) information about your transactions with our affiliates, others, or us; (c) information we receive from consumer reporting agencies. We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. We restrict access to nonpublic information about you to those employees and entities that need to know that information in order to collect your account. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

PRA RECEIVABLES MANAGEMENT, LLC
www.portfoliorecovery.com

BY CERTIFIED MAIL R.R.R.
7017 1450 0000 8177 8277

August 29, 2018

Nicole Cruz
4311 North Fairhill St.
Philadelphia, PA 19140

Re: **§1326(a)(4) Proof of Required Insurance Coverage**
In re: Nicole Cruz
Chapter: 13, Case Number 14-18833
Collateral: 2013 Nissan Rogue VIN # JN8AS5MT7DW020544
PRA RM File No.: 783684

Dear Attorney Miller:

Please be advised, On March 31, 2017, Portfolio Recovery Associates, LLC became the successor in interest to Ally Bank with regard to the above-referenced account, and is now the creditor to whom your client's balance is owed. On March 31, 2017, servicing of your client's account was transferred to PRA Receivables Management, LLC ("PRA RM").

Our records reflect that your client is retaining possession of the collateral securing Portfolio Recovery Associates, LLC's ("PRA") interest to Ally Bank claim and pursuant to §1326(a)(4), we are respectfully reminding you that your client needs to provide proof that the automobile identified in the caption of this letter is insured against risk of fire, theft and collision.

Please send a copy of the policy's declaration page to our Lake Forest, CA office within 10 days from the date of this letter. Please change the loss payee to:

PRA Receivables Management, LLC
10 Orchard, Suite 100
Lake Forest, CA 92630
Telephone: 1-800-642-6233
Fax: 949-858-3821

Should you have any questions regarding this request, you may contact our office by telephone at (800) 642-6233 ext 33552, or by facsimile at (949) 858-3821.

Sincerely,


Christina Plamey
PRA Receivables Management, LLC

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PRA RECEIVABLES MANAGEMENT, LLC

BY CERTIFIED MAIL R.R.R.
7017 1450 0000 8177 8277

www.portfoliorecovery.com

Wednesday, August 29, 2018

Nicole Cruz
4311 North Fairhill St.
Philadelphia, PA 19140

Re: **Direct-to-Creditor Payment Default**
In re: Nicole Cruz
Chapter 13, Case No. 14-18833
Collateral: 2013 Nissan Rogue VIN# JN8AS5MT7DW020544
Post-petition Delinquency: \$8,045.08
Account number: 902021444

Dear Attorney Miller,

I hope this letter finds you well. I write regarding your Chapter 13 client, Nicole Cruz, as it relates to your client's 2013 Nissan Rogue. Please know that Ally Bank assigned your client's promissory obligation and its corresponding security interest in the 2013 Nissan Rogue to Portfolio Recovery Associates, LLC ("PRA") by filing a Notice of Transfer with the bankruptcy court pursuant to Fed. R. Bankr. P. 3001 (e)(2).

On March 31, 2017, Portfolio Recovery Associates, LLC became the successor in interest to Ally Bank with regard to the above-referenced account, and is now the creditor to whom your client's balance is owed. On March 31, 2017, servicing of your client's account was transferred to PRA Receivables Management, LLC ("PRA RM").

Your client's confirmed Chapter 13 repayment plan requires them to make timely, post-petition monthly direct-to-creditor payments relative to the 2013 Nissan Rogue loan in the amount of \$473.24 per month. However, PRA RM's records reflect that they have failed to make these payments.

While PRA RM stands ready to retain local counsel to file papers requesting that the automatic stay be lifted in PRA RM's favor so that it may exercise its security interest, I thought it might be more efficient to first contact your office in order to give your client an opportunity to make an arrangement so that filing such documents would not be necessary. **Your client should remit payment or contact my office before September 13, 2018.**

Should you have any questions regarding this request, you may contact our office by telephone at (800) 642-6233 ext 33552, or by facsimile at (949) 858-3821.

Sincerely,



Christina Pinney
PRA Receivables Management, LLC

This is not an attempt to collect a debt. In light of the bankruptcy pursuant to case number 14-18833, PRA RM does not seek to satisfy or collect any monetary claim against the obligors. PRA RM intends to exercise its in rem rights and claims in any collateral, only.

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Page 1 of 2

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